

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
Telecommunications Relay Services and)	
Speech-to-Speech Services for)	CC Docket No. 98-67
Individuals with Hearing and Speech)	CG Docket No. 03-123
Disabilities)	

MCI COMENTS

The one-year waiver of the requirement that telecommunications relay service (TRS) providers offer three-way calling capability, including providers of captioned telephone service, will expire by the end of February 2005. The Commission recently asked parties to comment on whether to allow the waiver of three-way calling for these TRS services to expire, whether to allow the three-way calling requirement to be met by subscription to local exchange company three-way calling features or customer premise

equipment capabilities, or whether to continue the waiver for an extended period of time.¹

MCI limits its comments to three-way text calling.

MCI began implementing the changes necessary to allow its relay platforms to be capable of conferencing in other parties soon after the one-year waiver was adopted.

That capability has been in place for some time. Three-way calling capability is a requirement MCI must meet as part of its California Relay contract, and it offers three-way calling capability voluntarily in the other states in which it is the chosen relay provider. MCI's three way calling capability allows parties to a TRS call between a TTY user and a voice caller to request establishment of a three-way call to another voice caller, or to another TTY. Three-way calling for text relay is technically feasible, and MCI sees no reason why the waiver for three-way calling should not be allowed to expire in February 2005, or soon thereafter.

AT&T states in its *Petition for Reconsideration* that it is unclear whether the three-way calling requirement contemplates that the parties to a TRS call between a TTY user and a voice caller would request establishment of a three-way call to another voice caller, or to another TTY user.² Only one relay operator is required for an MCI relay operator to establish a three-way call, and while there are some additional directions and rules required in order to facilitate the call, they are not significant.

¹ Federal Communications Commission Seeks Comment On Expiration Of Waiver Of Three-Way Call Requirements For Providers Of Telecommunications Relay Services (TRS), CC Docket No. 98-67, CG Docket No. 03-123, rel November 30, 2004.

² Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, AT&T Petition For Limited Reconsideration And For Waiver (*Petition for Reconsideration*), CC Docket No. 98-67, CG Docket No. 03-123, filed September 24, 2003.

AT&T asks the Commission to clarify the appropriate billing method that would apply to conferencing calling. MCI has been sought reimbursement for only total minutes of use per three-way conference call, and has not sought reimbursement for each leg of a three-way call, in conformity with the clarification the Commission has already made in its *Publix Order*³. Therefore, MCI concludes that the Commission may allow the waiver to expire in February 2005, or extend it for several more months to allow enough time for those without this capability enough time to make the necessary changes.

If you have any questions, please feel free to contact me at the number listed below.

Respectfully Submitted

/s/ Larry Fenster

Larry Fenster

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cc: Thomas Chandler

³ In the Matter of Publix Network Corporation; Customer Attendants, LLC; Revenue Controls Corporation; SignTel, Inc.; and Focus Group, LLC; Order to Show Cause and Notice of Opportunity for Hearing (*Publix Order*), EB Docket No. 02-149; Order To Show Cause And Notice Of Opportunity For Hearing File No. EB-01-TC-052; NAL/Acct. No. 200232170003; FRN: 0004-3412-51, 17 FCC Rcd 11487 (2002), &38.

Statement of Verification

I have read the foregoing, and to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct.

Executed on December 17, 2004

/s/Larry Fenster

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